

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

IN RE VITAMIN C ANTITRUST  
LITIGATION

MASTER FILE 06-MD-1738 (BMC) (JO)

**This Document Relates To:  
ALL CASES**

**INJUNCTION CLASS PLAINTIFFS' NOTICE OF MOTION FOR  
PRELIMINARY APPROVAL OF SETTLEMENT WITH  
DEFENDANT NORTHEAST PHARMACEUTICAL CO., LTD.**

PLEASE TAKE NOTICE THAT, upon the Declaration of Michael D. Hausfeld in Support of Injunction Class Plaintiffs' Motion for Preliminary Approval of Settlement with Defendant Northeast Pharmaceutical Co., Ltd., and the Memorandum of Law in Support of Injunction Class Plaintiffs' Motion for Preliminary Approval of Settlement with Defendant Northeast Pharmaceutical Co., Ltd., dated March 25, 2013, and all other papers and proceedings herein, Plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable Brian M. Cogan, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure, to enter an order:

1. preliminarily approving the NEPG Settlement Agreement and find that its terms are sufficiently fair, reasonable, and adequate for notice to be issued;
2. ordering Class Counsel to disseminate notice to the Class, upon submission of proposed notices and approval by the Court of the form of notice and the notice plan; and
3. approving Rust Consulting as Administrator of the Settlement, and Citibank as Escrow Agent.

Oral argument on this motion, if any, will be held on a date and time set by the Court.

Dated: March 25, 2013

Respectfully submitted,

/s/ Michael D. Hausfeld

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